

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
REDIRECTED FROM WITNESS NEEDHAM
(APWU/USPS-T8-12(E))

In accordance with P.O. Ruling MC96-3/8, the United States Postal Service hereby provides the response to the following interrogatory of the American Postal Workers Union, AFL-CIO: APWU/USPS-T8-12(e), filed on August 13, 1996, and redirected from witness Needham.

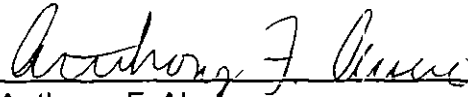
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -5402
August 29, 1996



RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
REDIRECTED FROM WITNESS NEEDHAM

APWU/USPS-T8-12 At page 128 of your testimony you assert that Express Mail provides more expeditious delivery and is either equivalent in price or only marginally more expensive than Special Delivery.

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e. Please provide the mean, median, and mode weight for Special Delivery mail matter for each year from 1970 through 1995.

* * * * *

RESPONSE:

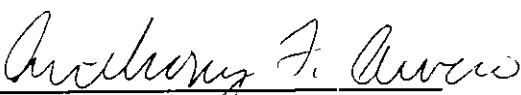
e) Statistics on Weight per Piece of Special Delivery Mail

(Data in ounces)

<u>Fiscal Year</u>	<u>Mean</u>	<u>Median</u>	<u>Mode</u>
1992	14.65	1.33	1.01
1993	22.94	0.71	0.035
1994	4.14	0.50	0.40
1995	4.62	0.60	0.50

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony F. Alverno

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August 29, 1996